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August 9, 1995

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AUG 10 1995

US EPA  
Eastern PA Remedial  
Section 3HW22

Ms. Mary Rugala  
Senior Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107-4431

Re: Strasburg Landfill Superfund Site

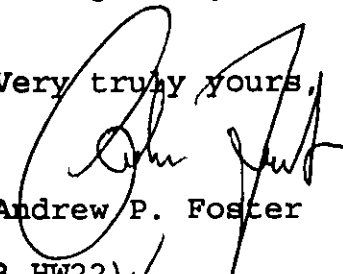
Dear Ms. Rugala:

This letter responds on behalf of Congoleum Corporation to EPA's update letter addressed to William J. Canavan dated July 3, 1995.

As information previously submitted to EPA demonstrates, the only relationship between Congoleum's Marcus Hook facility and the Strasburg Landfill was the disposal by Congoleum's transporter of non-hazardous plant trash during the one-year period from approximately April, 1982 to April, 1983. There is no technical or legal support for any alleged connection between the disposal of non-hazardous, PVC scrap flooring and the alleged presence of hazardous vinyl chloride in the landfill. Neither EPA nor any other party has presented any evidence to suggest that Congoleum's disposal of non-hazardous plant trash subjects Congoleum to CERCLA liability in connection with the Strasburg Landfill Site. Accordingly, once again Congoleum respectfully requests that EPA delete Congoleum from the list of PRP's for the Strasburg Landfill Site.

Thank you for your attention to this matter. Please feel free to contact me at (215) 988-2512 if you would like to discuss any of the matters addressed in this letter. Please direct all future correspondence regarding this matter directly to my attention.

Very truly yours,

  
Andrew P. Foster

cc: Mr. James P. Harper (EPA-3 HW22)